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Attorneys for United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
13

14 UNITED STATES OF AMERICA,	) NO. CR 19-226 RS-11
	)
15 Plaintiff,	) STIPULATION AND <del>PROPOSED</del>
	) ORDER MODIFYING BRIEFING AND
16 v.	) HEARING SCHEDULE
	)
17 MARCO DELGADILLO,	)
a/k/a "Tonio,"	)
	)
18 Defendant.	)
	)
19	)
20	)

21 The defendant, by and through undersigned counsel, and the United States, by and through  
22 Assistant United States Attorney Casey Boome, hereby stipulate and agree as follows:

23 WHEREAS, the Court, at the parties' request, set a briefing schedule with respect to Defendant  
24 Marco Delgadillo's motion to suppress and motion for the return of his mobile telephone;

25 WHEREAS, pursuant to the parties' subsequent requests, the Court modified the briefing  
26 schedule to allow the parties additional time to address the production of additional discovery and to  
27 engage in discussions to reach a disposition that would resolve the pending charges against the  
28 defendant and avoid further litigation of the pending motions;

STIP. AND PROPOSED ORDER MODIFYING BRIEFING SCHEDULE

1 WHEREAS, the parties remain engaged in productive negotiations and require additional time to  
2 continue those negotiations in an effort to secure a resolution in lieu of litigation;

3 THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's confirming order,  
4 to the following modified briefing and hearing schedule:

- 5 • The defendant's Memorandum in Reply shall come due November 22, 2019; and
- 6 • The Court shall hold a hearing on the defendant's motions at 2:30 p.m. on December,  
7 2019, the date on which this matter is presently set for a status conference with all co-  
8 defendants.

9 If, before December 10, 2019, the parties have reached a resolution, the parties shall promptly notify the  
10 Court and request that the motion hearing be vacated and reset for a change of plea hearing.

11 IT IS SO STIPULATED.

12  
13 DATED: October 17, 2019

Respectfully submitted,

14 DAVID L. ANDERSON  
15 United States Attorney

16 /s/ Casey Boome  
17 CASEY BOOME  
Assistant United States Attorney

18 DATED: October 17, 2019

19 /s/ with permission  
20 ETHAN ATTICUS BALOGH  
Attorney for Marco Delgadillo

1 ~~PROPOSED~~ ORDER

2 Based on the stipulation of the parties and for good cause shown, the Court hereby MODIFIES  
3 the briefing and hearing schedule previously set, as follows:

- 4 • The defendant's Memorandum in Reply shall come due November 22, 2019; and  
5 • The Court shall hold a hearing on the defendant's motions at 2:30 p.m. on December, 10,  
6 2019.

7 The Parties are further directed to notify the Court upon any successful resolution of the case so  
8 that the Court may vacate the hearing schedule upon such notice, and then schedule a change of plea  
9 hearing in its stead.

10 SO ORDERED.

11  
12  
13 Dated: 10/18/19



HON. RICHARD SEEBORG  
United States District Court Judge